

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK, by  
LETITIA JAMES, Attorney General of the State of  
New York,

Plaintiff,

-against-

Case No. 22-cv-06124 (JMF)

ARM OR ALLY, LLC; BLACKHAWK  
MANUFACTURING GROUP, INC., A/K/A 80  
PERCENT ARMS, INC. OR 80 PERCENT ARMS;  
SALVO TECHNOLOGIES, INC., A/K/A 80P  
BUILDER OR 80P FREEDOM CO.; BROWNELLS,  
INC., A/K/A BROWNELLS OR BOB BROWNELL'S;  
GS PERFORMANCE, LLC, A/K/A GLOCKSTORE OR  
GSPC; INDIE GUNS, LLC; KM TACTICAL;  
PRIMARY ARMS, LLC; RAINIER ARMS, LLC; AND  
ROCK SLIDE USA, LLC,

**AFFIDAVIT OF  
INVESTIGATOR PETER  
SCHOTTENFELD**

Defendants.

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STATE OF NEW YORK                    )  
COUNTY OF WESTCHESTER        ) ss.:

Peter Schottenfeld, being duly sworn, deposes and says:

1. I am an Investigator employed by the Office of the New York State Attorney General (hereinafter "NYAG"). The facts set forth in this affidavit are the results of an investigation I performed in the course of my job duties. All statements are based upon my personal knowledge and investigation.

2. In late May 2022 I was assigned to assist in the investigation of numerous online retailers that were selling and shipping gun frames, commonly referred to as "80% frames," to New York State. This investigation involved businesses including Defendants Arm or Ally, Brownells, and Indie Guns. I was assigned to assist in the purchase from the website Indie Guns.

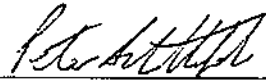
3. My responsibilities, as it pertained to this investigation, were to receive the shipment once it arrived, photograph and weigh the items, and then store them in a secure location.

4. On June 9, 2022 I took possession of the shipment from Indie Guns. The package was left on a residential doorstep and no signature was required from the shipper. I photographed the package and contents as well as measured and weighed the package. The total weight of the package was 1.4 pounds and the dimensions of the package were 11 inches in length by 6 inches in width (See Exhibit A, photographs of the items received from Indie Guns).

5. The unfinished frame sent by Indie Guns was not marked with a serial number.

6. All items received from Indie Guns were then stored in a secure location at the NYAG.

7. Some information in the attached exhibits, such as undercover names and addresses, have been redacted. Disclosure of this information would jeopardize current and future NYAG investigations, however, unredacted copies are available to the court upon request.



Peter Schottenfeld

Sworn to before me this

11 day of January, 20 23.

  
NOTARY PUBLIC

RALPH DORISMOND  
Notary Public, State of New York  
No. 01DO6126511  
Qualified in New York County *B2 on X*  
Commission Expires May 9, 20 25